

**From:** [Jay Field](#)  
**To:** [Eric Blischke/R10/USEPA/US@EPA](#)  
**Cc:** [Robert Neely](#); [Mary Baker](#); [Benjamin Shorr](#); [Burt Shephard/R10/USEPA/US@EPA](#); [Joe Goulet/R10/USEPA/US@EPA](#); [Jennifer Peterson](#)  
**Subject:** Re: Roll-Out Meeting and Next Steps on Round 2 Report  
**Date:** 03/02/2007 12:42 PM

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Eric,  
just a quick note that the benthic toxicity discussion topic also includes toxicity classification and the use of all of the toxicity endpoints, several of the same issues that we raised in comments on the benthic interpretive report.  
Jay

Blischke.Eric@epamail.epa.gov wrote:

> Thanks to everyone who attended the Roll Out Meeting. I think it was a  
> good introduction to the report and should help us as we move forward  
> towards the identification of data gaps.

>  
> At the end of the Roll-Out meeting, we agreed to have an internal  
> conference call/meeting next Wednesday afternoon (1:00 to 4:00 pm). I  
> imagine this meeting will be similar to a TCT meeting and I encourage  
> participants to gravitate to common locations with the TCT  
> meetings. We will use our conference line **Non-Responsive** access code  
> **Non-Responsive**

> For the call, I would like us to think about 3 things:

> 1) What topics would we like more information on from the LWG? We are  
> planning on having additional technical discussions with the LWG (for  
> the purposes of understanding the report) on March 14, 2007. Here is  
> the list of topics that I have from yesterday (which may be slightly  
> incomplete):  
> Risk Management, iPRG and iAOPC development  
> Predictive models for benthic toxicity  
> Hill topping and moving average statistical evaluations  
> SWAC calculations and the development of Thiessen polygons  
> Upstream or background analysis  
> The relationship between surface water, sediment and tissue  
> concentrations (I would term this bioaccumulative relationships  
> focusing on BSAFs and the food web model)  
> Subsurface sediment  
> Loading analyses  
> Risk assessment scale  
> Data sharing and supporting information.

> 2) Preliminary Identification of Data Gaps: In December 2005 and  
> February 2006, EPA provided the LWG with direction on the data necessary  
> to complete the RI/FS. I am attaching (again) the data gaps summary  
> table from the Round 3 SOW. As everyone should be aware, a number of  
> the data gaps have been filled as part of the Round 3A data collection  
> effort and the LWG is proposing to collect additional surface and  
> subsurface sediment data and perform a limited number of bioassays as  
> part of Round 3B. Although these efforts represent a good start, they  
> clearly do not address all the data gaps we previously identified. Here  
> is my take on where we are regarding the data gaps we previously  
> identified:

> Surface Sediment: The LWG has collected surface sediments upstream and  
> downstream of the site. The LWG is also proposing additional sediment  
> samples to support the background analysis and for nature and extent  
> purposes. It is unclear whether these will be sufficient. The LWG is  
> not proposing additional sediment samples collocated with tissue to  
> enhance our understanding of bioaccumulative relationships.  
> Riparian Soil: The LWG has not proposed any riparian soil samples.  
> Some of this may be an upland data gap.  
> Subsurface Sediment: The LWG has collected subsurface sediments  
> upstream and downstream of the site. They are proposing additional  
> subsurface sediment to support the FS. Again, it is unclear whether  
> these will be sufficient. SedFlume measurements were performed as part  
> of Round 3A.  
> Surface Water: Additional surface water has been and is being  
> performed. In addition, the LWG is embarking on an effort to  
> characterize stormwater across the site to look at contaminant loading  
> and recontamination potential. Other measurements (e.g., settling  
> velocity) have been performed to support the fate and transport  
> analysis. SPMD measurements to look at groundwater discharge of develop  
> BCFs have not been proposed.  
> Transition Zone Water: Although not mentioned specifically as a data  
> gap in the Round 2 report, this is clearly on the table. We have talked  
> about 3 elements: New sites, looking at advective groundwater transport  
> as a mechanism for moving deep sediment contamination to the surface or  
> water column and filling data gaps at the 9 sites previously targeted.  
> Fish and Shellfish Tissue: With the exception of lamprey ammocoetes and  
> pre-breeding sturgeon, no additional fish tissue has been proposed.  
> This is clearly the data gap that we are the furthest apart on.  
> Invertebrate Tissue: None proposed by LWG. We do have the benefit of  
> the Round 2B clam tissue data which we had not seen at the time we  
> developed data gaps.  
> Sediment Toxicity: The LWG proposed 11 samples in areas where the  
> benthic toxicity analysis (empirical measurements and predictive models)  
> were indeterminate. Additional testing is likely required.  
> Bioaccumulation Testing: None proposed by the LWG. We do have the  
> benefit of the laboratory bioaccumulation tests performed on  
> lumbriculous and corbicula.  
>

> 3) What additional data analyses and evaluations do we need to perform  
> to help us evaluate the Round 2 Report and identify data gaps? These  
> are areas where the LWG Round 2 Report falls short in terms of data  
> presentation (e.g., looking at individual chemicals or magnitude of  
> risk), where the analysis was not performed or where an alternate  
> analysis would be helpful (e.g., additional evaluation of contaminant  
> uptake and the dietary pathway) or where we need to reproduce the  
> analysis that the LWG did (e.g., food web and floating percentile  
> models) to help us identify data gaps. As we think about this, please  
> be aware that we can not do everything and that we will need to  
> prioritize near term analyses and evaluations towards those that will  
> allow us to identify and support the need for additional data.  
>  
> Finally, I want people to understand that I view our identification of  
> data gaps as a three step process:  
>  
> 1) Understand the site. It is my expectation that by now, everyone  
> understands the site and the data. This includes contaminants,  
> distribution, sources, physical features, etc.  
> 2) Understand the data: The Round 2 Report is an excellent tool for  
> helping us understand the data. Supplementing the report with our own  
> evaluations should enhance our understanding of what is happening at the  
> site. This is the stage we are currently in. Over the next 4 - 6  
> weeks, we will continue these efforts at a high level.  
> 3) Confirm Data Gaps: Based on steps 1 and 2, we will complete the  
> identification of Round 3B data gaps. We will be building off the data  
> gaps previously identified by EPA and our partners a year or so ago.  
> This is the stage we need to be planning for. As we have indicated, we  
> expect a series of rolling FSPs beginning in mid to late April that will  
> serve as the vehicle for finalizing data gaps.  
>  
> Please send me any thoughts you might have on issues, data needs and  
> data evaluations. I look forward to continuing these discussions next  
> week.  
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> Thanks, Eric  
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> (See attached file: SOWDataGapsSummaryTable.doc)

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